

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CARLENE BECHEN,
ELVIRA BUMPUS, RONALD BIENDSEI,
LESLIE W. DAVIS, III, BRETT
ECKSTEIN, GEORGIA ROGERS,
RICHARD KRESBACH, ROCHELLE
MOORE, AMY RISSEEUW, JUDY
ROBSON, JEANNE DANCHEZ-BELL,
CECELIA SCHLIEPP, TRAVIS
THYSSEN and CINDY BARBERA,

Case No. 11-C-562
JPS-DPW-RMD

Plaintiffs,

TAMMY BALDWIN, GWENDOLYNNE
MOORE, and RONALD KIND,

Intervenor-Plaintiffs,

v.

Members of the Wisconsin Government
Accountability Board, each only in his
official capacity: MICHAEL BRENNAN,
DAVID DEININGER, GERALD NICHOL,
THOMAS CANE, THOMAS BARLAND,
TIMOTHY VOCKE, and KEVIN
KENNEDY, Director and General Counsel
for the Wisconsin Government
Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR.,
THOMAS E. PETRI, PAUL D. RYAN, JR.,
REID J. RIBBLE, and SEAN P. DUFFY,

Intervenor-Defendants

VOCES DE LA FRONTERA, INC.,
RAMIRO VARA, OLGA VARA, JOSE
PEREZ, and ERICA RAMIREZ,

Case No. 11-CV-1011
JPS-DPW-RMD

Plaintiffs,

v.

Members of the Wisconsin Government
Accountability Board, each only in his
official capacity: MICHAEL BRENNAN,
DAVID DEININGER, GERALD NICHOL,
THOMAS CANE, THOMAS BARLAND,
TIMOTHY VOCKE, and KEVIN
KENNEDY, Director and General Counsel
for the Wisconsin Government
Accountability Board,

Defendants.

Defendants' Motion For Protective Order

Pursuant to Fed. R. Civ. P. 26(c)(1), Defendants, Michael Brennan, David Deininger, Gerald Nichol, Thomas Case, Thomas Barland, Timothy Vocke, and Kevin Kennedy (each in their official capacity), by their attorneys, J.B. Van Hollen, Attorney General, and Maria S. Lazar, Assistant Attorney General, and Reinhart Boerner Van Deuren, s.c., by Patrick J. Hodan, Daniel Kelly, and Colleen E. Fielkow, move the Court for an order protecting them from the undue burden and expense of producing material related to errors in federal census data discovered after enactment of 2011 Wisconsin Act 43 & 44. For the reasons set

forth in Defendants' accompanying memorandum, Plaintiffs discovery requests for this information are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. The moving defendants, by their attorneys, further certify, that prior to filing this motion and pursuant to Fed. R. Civ. P. 26(c)(1), they have in good faith conferred with plaintiffs in an effort to resolve their dispute regarding this information without court action. However, those efforts failed.

Dated this 16th day of January, 2012.

Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
(608) 267-3519
(608) 267-2223 (fax)
lazarms@doj.state.wi.us

J.B. VAN HOLLEN
Attorney General

s/Maria S. Lazar
MARIA S. LAZAR
Assistant Attorney General
State Bar #1017150

Reinhart Boerner Van Deuren s.c.
1000 North Water Street, Suite 1700
Milwaukee, WI 53202
Telephone: 414-298-1000
Facsimile: 414-298-8097

s/Daniel Kelly
Daniel Kelly
WI State Bar ID No. 1001941
dkelly@reinhartlaw.com
Patrick J. Hodan
WI State Bar ID No. 1001233
phodan@reinhartlaw.com
Colleen E. Fielkow
WI State Bar ID No. 1038437
cfielkow@reinhartlaw.com

Attorneys for Defendants

REINHART\8233746